

A.C. 39881

AUSTIN HAUGHWOUT

APPELLATE COURT

v.

STATE OF CONNECTICUT

LAURA TORDENTI ET AL.

JULY 6, 2017

**PLAINTIFF'S MOTION FOR EXTENSION OF TIME
WITHIN WHICH TO FILE HIS BRIEF**

Pursuant to Practice Book § 66-1, the plaintiff, Austin Haughwout (student), respectfully moves for an extension of time within which to file his brief in *Haughwout v. Tordenti et al.*, AC 39881. Undersigned counsel has discussed this motion with leading counsel of record for Dr. Tordenti of Central Connecticut State University (school), Assistant Attorney General Ralph Urban, who **consents** to this motion.

I. Brief History of the Case

The student was expelled from Central Connecticut State University (school). The basis of the expulsion was statements and non-verbal conduct construed as threatening by the school. At this time, the student as represented by counsel other than the undersigned. The student filed an administrative appeal in the superior court, alleging deprivation of free speech and due process rights, as well as misapplication of regulations. On November 17, 2016, the trial court rendered summary judgment for the school.

This appeal was filed on December 6, 2016. A preargument conference was conducted on June 6, 2017. Undersigned counsel participated in this case for the first time in the PAC approximately 30 days ago. It was not clearly established that undersigned counsel would be undertaking this representation until that date. Briefs were ordered due 40 days from that date.

II. Legal Grounds Relied On

The student relies on the procedures set forth in Practice Book § 66-1 et seq.

III. Specific Facts Relied On and Practice Book § 66-1 (c) (1) Statements

Reason for the Requested Extension

Undersigned counsel is representing the student on a pro bono basis. Undersigned counsel nonetheless carries a full case load working as the sole associate in a two-attorney firm. In addition, this facts-intensive case involves highly technical areas of constitutional, administrative, and criminal law. In order to deliver a quality brief on this volunteer basis, additional time is required.

Status of the Brief

Arguments have been refined and sharpened from the five or six originally claimed to three. The principle case law that will be relied upon in the lead issue has been researched and shared with opposing counsel. Although the arguments in the remaining two issues are developed, specific analogous cases are still being evaluated.

Client Mailing Statement

A copy of this motion has been sent to the plaintiff.

THE STUDENT

BY: /s/ Mario Cerame 433928
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CERTIFICATION

In accordance with Practice Book §§ 10-13 and 62-7, a copy of this motion has been served on each other counsel of record by United States mail, postage prepaid.

Attorney Ralph Urban II, Esq.
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/s/ Mario Cerame 433928
Mario Cerame

CERTIFICATION

This motion is in compliance with all provisions of Practice Book § 66-3.

/s/ Mario Cerame 433928
Mario Cerame